Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of Applications for Consent to the Transfer of Control of Licenses and Section 214 Authorizations from Ameritech Corporation, Transferor, to SBC Communications Inc., Transferee	)))))	CC Docket No. 98-141

JOINT DECLARATION OF MICHAEL A. BEACH AND THERESE K. FAUERBACH IN SUPPORT OF COMMENTS OF MCI WORLDCOM, INC.

We, Michael A. Beach and Therese K. Fauerbach, declare:

1. We submit this joint declaration in support of the Comments of MCI WORLDCOM, Inc. ("MCI WorldCom") concerning the proposed merger between SBC Communications, Inc. ("SBC") and Ameritech Corporation ("Ameritech"). The purpose of this Declaration is to provide examples of differences between SBC and Ameritech on issues of importance to competitive local exchange carriers ("CLECs") and the role of benchmarking in negotiating with incumbent local exchange carriers ("ILECs"). As described below, each of us has significant knowledge concerning the actions and positions of one of the two companies -- Michael Beach concerning SBC and Therese Fauerbach concerning Ameritech.

2. Michael Beach currently holds the position of Vice President of MCIWorldcom. His duties in that position include responsibility for negotiating and implementing interconnection arrangements between SBC and MCI WorldCom concerning local services, and for managing MCI WorldCom's relationship with SBC as a purchaser of exchange access. Because of his responsibilities, he is familiar with the terms and conditions on which SBC is willing to provide interconnection, unbundled network elements, and services for resale to CLECs, including MCI WorldCom, and the terms and conditions on which it is willing to provide exchange access to

interexchange carriers, including MCI WorldCom. The information described below concerning SBC is based on Mr. Beach's personal knowledge through direct dealings with representatives of SBC and from information learned in the ordinary course of business from colleagues at MCI WorldCom who deal first-hand with representatives of SBC.

3. Therese K. Fauerbach currently holds the position of Vice President of MCImetro. Her duties in that position include responsibility for negotiating and implementing interconnection arrangements between Ameritech and MCI WorldCom concerning local services, and for managing MCI WorldCom's relationship with Ameritech as a purchaser of exchange access. Because of her responsibilities, she is familiar with the terms and conditions on which Ameritech is willing to provide interconnection, unbundled network elements, and services for resale to CLECs, including MCI WorldCom, and the terms and conditions on which it is willing to provide exchange access to interexchange carriers, including MCI WorldCom. The information described below concerning Ameritech is based on Ms. Fauerbach's personal knowledge through direct dealings with representatives of Ameritech and from information learned in the ordinary course of business from colleagues at MCI WorldCom who deal first-hand with representatives of Ameritech.

4. Our knowledge is based primarily on our experience in dealing with SBC and Ameritech on behalf of MCI Telecommunications Corporation ("MCI"), which recently became a wholly owned subsidiary of MCI WorldCom. WorldCom may have had some different experiences before it merged with MCI to form MCI WorldCom. When we refer to MCI WorldCom, we include not only the current company but also its predecessors.

SHARED TRANSPORT

5. As the Commission is aware from its review of Ameritech's application to provide interLATA services in Michigan, Ameritech Michigan has not complied with its obligations under the Telecommunications Act of 1996 and the Commission's *Local Competition Order* to provide CLECs with nondiscriminatory access to unbundled local transport on shared interoffice transmission facilities ("shared transport"). After the Commission denied its section 271 application, Ameritech continued to refuse to provide shared transport throughout its region. Regrettably, Ameritech has not begun to provide shared transport even after the Eighth Circuit affirmed the Commission's shared transport order.

6. We understand the Eighth Circuit left open one critical issue in its decision — whether shared transport is priced in a way that makes it a service subject to resale at a wholesale rate, or an unbundled network element that must be made available at cost-based rates. Ameritech has not informed MCI WorldCom whether it will continue to litigate this pricing issue with the commissions in any of its in-region states. Ameritech's willingness to provide access to shared transport at cost-based rates is still therefore up in the air.

7. Ameritech has consistently taken the position that references in its interconnection agreement with MCI WorldCom to "shared" transport mean transport dedicated for the use of two or more carriers. Thus, Ameritech would permit two CLECs to purchase a dedicated trunk that the two CLECs could then share. Ameritech does not, however, give CLECs the option of purchasing shared transport over trunks in Ameritech's network, as is required by the Commission's orders. Because Ameritech's concept of "shared" transport is a "point-to-point" arrangement that requires CLECs to specify beforehand which locations will be served by the transport facilities, Ameritech's offering cannot provide CLECs with the flexibility and economy that can be realized through the use of common transport. Moreover, the use of dedicated

facilities is often not economically viable for CLECs, and Ameritech's restrictive approach means that CLECs get lesser quality and capacity than Ameritech provides to itself.

8. In contrast to Ameritech, SBC does provide shared transport to CLECs as an unbundled network element. Although we understand that SBC has joined Ameritech as a party to legal proceedings challenging the requirement to provide shared transport, SBC is nevertheless providing (or, for some states, has said it will provide) shared transport to CLECs at rates that it contends are cost-based.

COMBINATIONS

9. As the Commission knows from its review of comments concerning Ameritech Michigan's section 271 application, Ameritech refuses to provide CLECs with combinations of unbundled network element ("UNEs") at cost-based rates, even if the UNEs exist in combined form in Ameritech's network. Instead of providing combinations, Ameritech insists that CLECs combine UNEs themselves through collocation. Ameritech therefore requires CLECs to use their own network elements in combination with UNEs leased from Ameritech to provide a retail telecommunications service. Even where Ameritech has interconnection agreements that do specify certain required combinations, Ameritech now takes the position that those provisions must be renegotiated, and it will not provide combinations pursuant to the interconnection agreement in the meantime. Ameritech will not even consider a request for any combination of UNEs not specified in an interconnection agreement unless CLECs use the "bona fide request" (or "BFR") process, which dramatically slows down any request for a combination. The lack of practical ability to use combinations of UNEs from Ameritech seriously hampers the ability of MCI WorldCom and other CLECs to compete effectively against Ameritech in the local markets that it currently monopolizes.

10. Although they are litigating their continuing obligation to combinations of UNEs specified in the interconnection agreements between them and MCI WorldCom, SBC's two largest operating companies, Southwestern Bell Telephone Company ("SWBT") and Pacific Bell ("PacBell"), are providing these combinations while the issue is litigated. After SWBT initially agreed to continue to provide UNE combinations pursuant to the interconnection agreement, it tried to renege, but the Texas Public Utilities Commission required it to honor its initial commitment in a decision subsequent upheld by a federal court in Texas. Pacific Bell informed MCI that it will continue to provide UNE combinations specified in the current interconnection agreement until that agreement expires in February 2000.

OPERATIONS SUPPORT SYSTEMS FOR BILLING

11. Before SBC acquired PacBell, PacBell used the Carrier Access Billing System ("CABS") billing system to bill MCI for services. The CABS system was designed as a carrier-to-carrier system, and is "carrier-friendly" because, among other things, it provides extensive information that a carrier can use both for its own billing and to verify the accuracy of the ILEC's bills. Under the CABS system, MCI would receive two monthly bills, and both bills would have the same due date.

12. After SBC acquired PacBell, PacBell unilaterally informed MCI that, contrary to its repeated promises and contractual obligations, it was changing billing systems to the Customer Record Information System ("CRIS") billing system, a system developed for use with retail — not carrier — sales. The CRIS system provides substantially less information than does CABS, and makes it significantly harder for a carrier to verify the accuracy of the bills and reformat the information into bills to be sent to the carrier's customers. Moreover, instead of receiving two monthly bills with a single due date, under the CRIS system MCI WorldCom receives thirty-eight bills with nineteen different due dates.

13. Although MCI and PacBell have negotiated a resolution of the contractual dispute that arose from the change in billing system, the new CRIS system has imposed significant costs on MCI, and still today MCI is not able to verify the accuracy of the thousands of pages of CRIS bills received each month.

DIRECTORY ASSISTANCE DATA

14. MCI and Ameritech recently reached a negotiated agreement under which Ameritech will provide directory assistance data to MCI in bulk format (instead of obtaining the data on a listing-by-listing basis). Obtaining the data in bulk format will enable MCI to provide the information to its customers in an efficient and cost-effective manner. In negotiations with MCI, Ameritech did not object in principle to providing the data in bulk format.

15. In contrast, SBC has vigorously resisted providing bulk directory assistance data as a UNE on a nondiscriminatory basis. MCI was forced to litigate this issue -- in addition to other directory assistance issues -- and recently obtained an arbitration award in Texas directing SBC to provide such bulk data.

INTELLECTUAL PROPERTY

16. As the Commission is aware from MCI's Petition for Declaratory Ruling, SBC has refused to allow access to UNEs unless CLECs first obtain licenses or right-to-use agreements from each and every outside vendor who SBC claims may have intellectual property embedded in the network element. This approach, if permitted, would vitiate CLECs' ability to use unbundled network elements to compete with SBC.

17. In contrast, Ameritech has not taken a similar position on intellectual property rights.

BENCHMARKING IN GENERAL

18. In preparation for separate negotiations with SBC or Ameritech, MCI WorldCom routinely analyzes the actions and policies of other ILECs with respect to specific local

competition issues. MCI WorldCom can use, and does use, the willingness or ability of one ILEC to provide a service on particular terms and conditions when it bargains with another ILEC for the same arrangement. For example, MCI WorldCom uses its experience with other ILECs when an ILEC claims that it is not technically feasible to provide a service or capability that another ILEC provides to MCI WorldCom, or that a price proposed by MCI WorldCom is unreasonably low even though other ILECs provide the same capability or service at the same price.

19. Benchmarking has proven to be a useful tool not only for federal and state regulators, but also for incumbent LECs' customers to move incumbent LECs toward providing interconnection and access on more reasonable terms and conditions. MCI WorldCom has effectively used benchmarking with SBC, Ameritech and other ILECs not only in its negotiations as a CLEC but also in its negotiations concerning the price and quality of exchange access that they provide to MCI WorldCom as an interexchange carrier. For example, MCI WorldCom has used, and continues to use, the willingness of one ILEC to use a particular system, pricing structure or provisioning process to persuade other ILECs to adopt the same capabilities for the provision of exchange access.

20. MCI WorldCom's ability as a CLEC and as an interexchange carrier to benchmark the different ILECs would be greatly diminished if SBC and Ameritech, or Bell Atlantic and GTE, are permitted to merge. Before SBC acquired PacBell, the two companies took different positions on some important positions. After the acquisition, PacBell took the SBC position, even if PacBell had to renege on earlier commitments in order to do so. To the extent that SBC and Ameritech take different positions on significant issues for CLECs and interexchange carriers, it is reasonable to expect that they will no longer do so if they are permitted to merge, and that MCI WorldCom's ability to negotiate with ILECs based on positions taken by other ILECs will end.

We declare under penalty of perjury that the foregoing is true and correct.

Executed on October __, 1998.

Michael A Beach

Executed on October 14, 1998.

Therese K. Fauerbach

Executed on October 14, 1998.

Michael A. Beach

Executed on October __, 1998.

Therese K. Fauerbach

PACIFIC BELL INTERNET

DSL

DSL Internet Access

DSL (Digital Subscriber Line) Internet Access is a new technology that runs over standard phone lines. Unlike regular modem and ISDN access, DSL is "always on" and allows you to download files and view graphic intensive web pages at speeds up to 10 times faster than ISDN and up to 50 times faster than conventional 28.8 Kbps modems. You can learn more about DSL technology or, if you have a few questions, go to our DSL Frequently Asked Questions.

Why Should I Choose Pacific Bell Internet's DSL Service?

Pacific Bell Internet was the first Internet Service Provider in California to provide Internet access during the technical tests of Pacific Bell DSL technology. Due to this leadership, we have provided services to some of our customers for nearly two years. So when you choose Pacific Bell Internet for DSL you know you will be getting reliable service.

- **A complete range of DSL Internet Access solutions**
  Pacific Bell Internet DSL services include individual user access, small lan access and business access. We also offer complete solutions including all necessary equipment and on-site installation services.

- **Availability**
  Pacific Bell has recently announced an aggressive rollout of DSL services throughout the state of California. Check to see if DSL services are available for you.

Benefits

The increased bandwidth and flexibility of DSL offers customers an unmatched combination of speed and price.

- ***Increased speed*** - The bandwidth of DSL allows customers to increase performance up to 50 times greater than conventional modems and 10 times greater than ISDN.
- ***Low price*** - When compared to ISDN usage charges in California or equivalent Frame Relay services, DSL service provides superior value to the customers needing Internet access from a single location.
- ***Permanent Internet presence*** - DSL service is a dedicated circuit that requires no dialing. Customers are always online as long as their PC and DSL modem are turned on. Static IP addresses provide customers with a constant connection to the Internet. Customers can host a web site or establish a full-time Internet-accessible server with DSL.
- ***Keep your POTS line*** - With Pacific Bell Internet's DSL service, customers can keep their existing POTS line. DSL installs on the same line with no interference to traditional telephone service. Unlike ISDN, no usage charges are incurred for DSL

service and no external power supply is required.

- ***Secure*** - DSL provides a dedicated connection to the Pacific Bell central office with data traffic routed directly to the Pacific Bell Fast Packet Network and on to Pacific Bell Internet. This provides a more secure connection than cable modems that use a shared LAN medium to connect to the Internet.

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ADSL QUESTIONS & ANSWERS

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What is ADSL?
What is the Ameritech.net High Speed Internet Service?
How is the Ameritech.net High Speed Internet Service Different from other Internet services?
How does the Ameritech.net High Speed Internet Service compare with 28.8K modems and ISDN?
Is it a standard dial-up service?
Where is the service available?
What kind of equipment is required?
Can I use Ameritech.net away from my desktop PC?
Is it difficult to install Ameritech.net High Speed Internet Service?
How much does it cost?
Where do I go for help?
How do I order?

What is ADSL?

ADSL is an acronym for Asymmetrical Digital Subscriber Line. ADSL is a new technology that allows information to be transmitted on a telephone line at very high speeds. ADSL serves as a replacement for dial-up Internet access services.

What is the Ameritech.net High Speed Internet Service?

Ameritech is delivering a number of advanced new services to enhance your Internet experience. These next-generation technologies (such as ADSL) offer greatly-improved speeds over traditional analog Internet connections so you can quickly access high-bandwidth applications and content.

How is the Ameritech.net High Speed Internet Service Different from other Internet services?

Ameritech.net High Speed Internet Service provides a complete package for using the Internet at very high speeds. The package includes an Internet access account with up to 5 email addresses and member IDs, customized browser software for your PC, a special modem, network interface card, and a high-speed ADSL line for connecting to the Internet.

How does the Ameritech.net High Speed Internet Service compare with 28.8K modems and ISDN?

Our High Speed Service beats both 28.8K modems and ISDN hands down: in fact, it can be up to 50 times faster than a standard 28.8K modem.

Is it a standard dial-up service?

No. Ameritech.net High Speed Internet Service uses a dedicated line. That means it's "always on" rather than "dialed up," and is directly connected to Ameritech.net. The result: our

members don't have to contend with the frequent busy signals encountered with other dial-up Internet services.

Where is the service available?

The High Speed Internet Service is currently available only in Ann Arbor, Michigan, but Ameritech.net is working hard to hook up as many customers as possible. By the end of the century, 70% of the homes in the Great Lakes region will have access to the service.

What kind of equipment is required?

A desktop PC with a Pentium processor, Windows95, 16MB RAM and 32MB of free hard disk space are required. The Ameritech.net High Speed Internet Service comes with everything else you need, including a special modem and network interface card (NIC), plus Microsoft Internet Explorer for Web browsing the web, using email, and posting to newsgroups.

Can I use Ameritech.net away from my desktop PC?

Yes. You can use your Ameritech.net account through a regular dial-up connection at any of our dozens of access numbers throughout the Great Lakes region. To receive an Ameritech.net dial-up software kit, call 1-800-NET-8775 or download it directly from our site at http://www.ameritech.net/index.html

Is it difficult to install Ameritech.net High Speed Internet Service?

No. Ameritech will send qualified technicians to perform the complete ADSL installation for you.

How much does it cost?

The Ameritech.net High Speed Internet Service is surprisingly affordable for home use. In fact, the cost is under $60 per month, which includes unlimited Internet access through Ameritech.net (installation and equipment costs not included).

Where do I go for help?

Ameritech.net has dedicated High Speed technical support and customer service representatives available from 8 AM to 11 PM, seven days a week. Call 1-800-910-4369 to speak with one of them.

How do I order?

Simple: call 1-800-910-4369

Ameritech.net™

High Speed FAQ

Regular FAQ

1. What's the big deal about Ameritech.net's High Speed Internet Service? Why is it better than the Internet access I have now?
2. What is ADSL?
3. How much does it cost?
4. Where is it available?
5. Will I incur any hourly charges when I use the ADSL line?
6. What are the system requirements for the service?
7. How are cable modems different from Ameritech.net's High Speed Internet Service?
8. What additional equipment do I need for the service?
9. How do I order High Speed Internet Service?
10. What is the installation process?
11. Who do I call when I need help?
12. Can I use Ameritech.net away from my desktop PC at home?
13. Can I keep my current email address?
14. Nice overview, but you didn't answer all my questions. Where can I find out more?

Geek FAQ

What's the big deal about Ameritech.net's High Speed Internet Service? Why is it better than the Internet access I have now?
Our High Speed service provides two big advantages over dial-up Internet access:

1. Speed. Our customers surf the Web and download files at speeds up to 1.0Mbps (128Kbps upstream). That's 35 times faster than standard 28.8Kbps modems.
2. "Always on" connection. Ameritech.net High Speed members never need to dial in again: when their computer is on, they're on the Internet.

These two features will change the way you use the Internet. With that much speed instantly available whenever your computer is on, you can use the computer the way you would a phone, a radio, or a TV: to check the forecast, leave a message for a friend, find directions to a concert, or make travel reservations.
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What is ADSL?
ADSL is an acronym for Asymmetric Digital Subscriber Line, a technology which provides high-speed data over the same telephone wiring that 28.8 modems use. An "ADSL line" is just a new way of using the phone line you've got right now. (In fact, the ADSL modem plugs into the computer and the phone jack exactly as a standard modem does.)
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How much does it cost?
Ameritech.net High Speed customers get unlimited high-speed Internet access for only $49.95 a month through the rest of 1998 (beginning next year the monthly fee will be $59.95 a month). An installation fee of $150 covers everything you need to get started online (right now we're waiving the $199 equipment fee).
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Where is it available?
Right now, Ameritech.net High Speed Internet Access is available in Ann Arbor and Royal Oak, MI. In just a few months, it will be available in other areas around Detroit, and in many Chicago suburbs as well. If you'd like us to contact you when High Speed Internet Access comes to your area, send us a message. Let us know where you live and how we can contact you, and we'll keep you posted!
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Will I incur any hourly charges when I use the ADSL line?
No. The monthly fee of $49.95 covers everything you need for unlimited access: the ADSL line itself, the modem, and your Ameritech.net membership.
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What are the system requirements for the service?
The High Speed Internet Service requires a desktop PC running Windows 95 with 16MB RAM, 32MB of free disk space, and a CD-ROM drive. (We plan to support a wide variety of system configurations in the near future -- like MacOS, Windows NT, and laptop computers.)
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How are cable modems different from Ameritech.net's High Speed Internet Service?
Although cable modems provide high speed Internet access and are appropriate for some users, they face limitations that ADSL does not:

- Cable modem users must share their bandwidth with other users in the area: if their neighbors are online and downloading files, the speed starts to drop. That doesn't happen with Ameritech.net, since the bandwidth is

dedicated to each customer.

- Cable modems require a coaxial cable to run from your TV hookup to the computer you use. ADSL plugs into the same telephone jack you're using right now.
- Cable modem services usually do not support a wide variety of applications. Users who become more sophisticated may want to move beyond email and Web surfing to hosting their own FTP servers, providing gopher directories, using telnet, etc. Ameritech.net's High Speed Internet Service is flexible enough to grow with the skills and interests of our members.

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What additional equipment do I need for the service?
Ameritech.net will provide members with an ADSL modem and a "NIC," or network interface card. (The NIC plugs into your computer's PCI slot.) Right now we're waiving the equipment charge of $199 -- it's a great deal!
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How do I order ADSL?
Just give us a call us at 1 (800) 910-4369. An Ameritech.net representative will ask you a few questions and arrange for an installation date to accommodate your schedule. It's easy!
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What is the installation process?
When you order the Ameritech.net High Speed Internet Service, two authorized Ameritech representatives will visit your home to install it. The first will hook up the ADSL line at your location; this work will happen outside, and you probably won't even know we've been there.

On your installation date, our second representative will make some minor changes to your telephone wiring, hook up the ADSL modem and Network Interface Card (NIC) to your computer, and install the Ameritech.net software. Finally, we'll make sure you're up and running and answer any additional questions you may have.
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Who do I call when I need help?
Toll-free customer service and technical support for Ameritech.net's High Speed Internet Service is available 8 AM to 11 PM Central. Just call 1 (800) 910-4369.
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Can I use Ameritech.net away from my desktop PC at home?
Absolutely! You can dial into any of Ameritech.net's local access numbers across the Great Lakes region using your member ID and

password. To take advantage of our High Speed Service, of course, you must use your home computer.
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Can I keep my current email address?
If you're already an Ameritech.net member, you can keep your current email address when you sign up for High Speed Internet Service. If you're coming to us from another provider, we'll give you an Ameritech.net email address -- but you can still use your existing email address, if your current Internet service provider allows it.
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Nice overview, but you didn't answer all my questions. Where can I find out more?
If you absorb technical information like Michael Jordan drinks Gatorade, visit the Geek FAQ. You'll find all the ADSL answers your delightfully geeky mind craves.
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High Speed Geek FAQ | Keep me posted!

Questions? Comments?

PACIFIC BELL INTERNET

FAQ

DSL FAQ: Availability and Pricing
Features, Capabilities and Requirements
General Product Information

More FAQs: About Pacific Bell Internet
Dedicated Access Service
Dial-up Service
General Internet
ISDN
Web Hosting
56K

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Are industry standards in place for xDSL?
Is DSL service from Pacific Bell DMT or CAP?
Why does DSL require a corporate customer or Internet Service Provider to connect with the Pacific Bell ATM network?
Are DSL speeds guaranteed?

Availability

Where is Pacific Bell DSL service available?

DSL is available today in selected central offices in California including: Danville, San Ramon, San Jose, Burlingame, Los Altos, Mountain View, Palo Alto, Redwood City, Santa Clara, Walnut Creek, and Sunnyvale. Availability will increase to a total of 87 central offices in California by the end of summer 1998.

Will all customers qualify for DSL service?

In addition to having DSL available in their central office, customers must be less than 16,000 feet or three miles from their central office to qualify for DSL service. We believe that 60 - 65% of customers out of each central office will qualify for the service. Eventually, the evolution of network technology will allow us to reach the small percentage of customers who are on the most distant ends of our local networks. To check if you qualify for DSL service, call **1-888-884-2DSL**.

Features and Capabilities

What DSL configurations will you offer?

Two speed packages are currently available from Pacific Bell: an asymmetrical configuration with up to 1.5 Mbps downstream and up to 384Kbps upstream upstream and a symmetrical service of up to 384 Kbps in both directions. Pacific Bell Internet currently offers Internet access for both speed packages. With the recently announced rollout planned for summer 1998, an additional speed package of up to 384Kbps downstream and up to 128Kbps upstream will also be offered.

What packages will be available with DSL?

Currently, single static IP address Internet service is available with either of the available speed options. For the rollout planned for summer 1998, Pacific Bell will introduce two ADSL offerings for Internet access. They will be priced as follows (pending regulatory approval and processes):

Home Pack DSL - includes the ADSL connection and Internet service, and is designed for high-volume home Internet users. Home Pack DSL provides transport speeds starting at 384 kilobits per second (Kbps) downstream and 128 Kbps upstream. The total monthly price for home Internet access package starts at $89, including $59 ADSL connection and $30 dedicated Internet service from Pacific Bell Internet Services.

Internet Access Pack DSL - includes the ADSL connection and Internet service, and is designed to meet the higher-speed Internet access needs of all businesses. Internet Access Pack DSL includes two speed options:

- **up to 384 Kbps downstream and 384 Kbps upstream** to meet the needs of small office/home office (SOHO) and small businesses requiring Internet access. The total monthly price for business Internet package starts at $199, including $99 ADSL connection and $100 dedicated Internet service from Pacific Bell Internet Services.

- **up to 1.5 megabits per second (Mbps) downstream and 384 Kbps upstream** for small businesses needing more bandwidth and for medium and large businesses where many employees share a single Internet connection. The total monthly price for the business Internet package for small offices starts at $339, including $189 ADSL connection and $150 dedicated Internet service

from Pacific Bell Internet Services.

Additional charges may apply for purchases of customer premise equipment and network integration services.

A one-time installation charge of $125 applies for each ADSL package. Pacific Bell will make ADSL equipment available to its residential and business customers. Pricing for ADSL equipment will vary by ADSL package.

Will business customers want to replace their existing DS1 (T1) Internet service with DSL?

There are clear technological differences between DSL and T1 Internet service. The first of which is that T1 service is 1.5Mbps both ways. This is important to many business applications including the hosting of a Web site. In addition, DS1 is a proven technology. While our technology tests demonstrate that DSL is very reliable, businesses tend to rely on established technologies when business critical data is at stake. The final difference is in regard to availability. Currently, DS1 Internet service is more widely available than DSL service.

Why would customers want Frame Relay service when they could have DSL service?

Frame Relay is an excellent choice for enterprise networking where many points must interconnect with each other. In addition, as with DS1 Internet service, Frame Relay provides higher bandwidth options for upstream traffic from a customer's site to the Internet. Furthermore, Frame Relay is a proven technology more suitable to business critical applications, making it a better choice for many businesses. Finally while Frame Relay Internet service is available throughout most of California, DSL Internet access is not yet widely available.

Why would customers want ISDN or analog modems when they could have DSL service?

ISDN and analog modems are switched access technologies that offer the ability for customers to dial many different locations for Internet access or other online services. With DSL services, the connection is a permanent connection to the Internet Service Provider. ISDN and analog modem customers who qualify for DSL service and only need to connect to the Internet from one location will want to switch to DSL in order to take advantage of the benefits of higher speeds and an "always on" connection. However, customers who do not have DSL service available from their central office, or who live beyond the local loop requirements, or need the mobility and flexibility of a switched service will remain as ISDN or analog modem customers.

General Product Information

What is xDSL or DSL?

DSL stands for high-speed Digital Subscriber Line. It is a dedicated digital circuit from your home to the telephone company's central office, using normal, copper telephone line. DSL also provides a separate channel for voice phone conversations, which means analog calls (voice, fax. etc.) can be carried at the same time high-speed data is flowing across the line. xDSL is a generic term that includes several variations:

ADSL (Asymmetric Digital Subscriber Line): 1.5 Mbps/64 Kbps-384 Kbps
HDSL (High-bit-rate Digital Subscriber Line): 1.5 Mbps/1.5 Mbps
SDSL (Single-line Digital Subscriber Line: 1.5 Mbps/1.5 Mbps
VDSL (Very high-data-rate Digital Subscriber Line): 13 Mbps-52 Mbps/1.5 Mbps-2.3 Mbps
RDSL (Rate Adaptive Digital Subscriber Line): various speeds

Pacific Bell is currently offering ADSL technology.

Will DSL service include transmission of regular voice telephone service?

Yes, DSL service will share a customer's telephone line (POTS) without affecting the customer's ability to place and receive voice calls. This means that customers do not need to provision a second phone line for DSL service. They can keep their existing phone number and add DSL as a feature to that line. Therefore, they will be billed for both the analog line (1 MB or FR) and the DSL service. If the line is a measured business line, usage will only be measured on the voice calls. DSL Internet access is billed at a flat rate.

Are industry standards in place for xDSL?

Some industry standards have been established and the ADSL Forum is developing technical guidelines for architecture, interfaces and protocols for telecommunications networks incorporating DSL transceivers. Examples include standards for discrete multi-tones (DMT) and carrier amplitude (CAP). Pacific Bell participates in and supports various industry forums that develop network standards including the UAWG DSL Lite standard currently under consideration.

Is DSL service from Pacific Bell DMT or CAP?

Pacific Bell offers DMT service.

Why does DSL require a corporate customer or Internet Service Provider to connect with the Pacific Bell ATM network?

The central office technology supporting DSL requires a single ATM connecting point, which is the Pacific Bell ATM network. Frame Relay to ATM interconnections are planned for the near future.

Are DSL speeds guaranteed?

The actual throughput rate that a customer receives may be impacted by conditions on the Internet. Pacific Bell will make every attempt to connect the customer's service at the optioned speed. It is important to note that DSL service is provided with a best-effort (Unspecified Bit Rate) Quality of Service on the ATM backbone, and as such, does not guarantee a specific constant or throughput rate.

Bell Atlantic

Bell Atlantic For Your Home
Infospeed DSL

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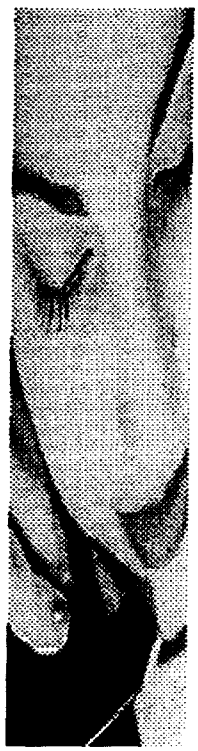

Save Over $300 NOW!!

SPECIAL OFFER

Infospeed DSL Internet Packages - Monthly Rate

Personal Infospeed (Infospeed 640 Kbps & Bell Atlantic.net)	$59.95
Professional Infospeed (Infospeed 1.6 Mbps & Bell Atlantic.net)	$109.95
Power Infospeed (Infospeed 7.1 Mbps & Bell Atlantic.net)	$189.95

Infospeed DSL - Monthly Rate

Infospeed 640 Kbps	$39.95
Infospeed 1.6 Mbps	$59.95
Infospeed 7.1 Mbps	$109.95

One Time Charges

One-time charges include the following:

Service Connection Charge:	$99.00
DSL Modem:	$325.00
Turnkey Home Installation:	$99.00

Please note that if you do not already have an Ethernet card, you will need to purchase one from Bell Atlantic or any other retail provider of Ethernet cards.

Special Offer

For customers subscribing to a Bell Atlantic.net DSL package for twelve months, the DSL modem is only $99 and the Ethernet card* and turnkey home installation are free!
*Offer available on selected Ethernet cards only.

If you're currently a Bell Atlantic ISDN customer, click here to find out about out ISDN Rewards upgrade program.

The levels of Infospeed DSL service available to you will vary based on your distance from your Bell Atlantic Central Office. Infospeed DSL is not available in all areas.

ISDN Rewards

Bell Atlantic will be "technology-change proofing" its high speed services by introducing an **ISDN Rewards** program concurrent with the launch of its Infospeed product line. Once Bell Atlantic Infospeed service is available in an area, Bell Atlantic residential customers who have purchased an ISDN modem from Bell Atlantic will be guaranteed an ADSL modem from the company at no additional charge when they subscribe to our Bell Atlantic.net DSL offering with a 12-month commitment.

Bell Atlantic residential customers who prefer to use another Internet provider will receive 1/2-off Bell Atlantic's normal ADSL modem price when they purchase an ADSL modem from Bell Atlantic. So, customers who want high-speed Internet access need not wait until ADSL-powered Infospeed is available in their area. Where Bell Atlantic Infospeed is not available or is not compatible with a person's line, customers can still order Bell Atlantic ISDN service for high-speed Internet access. Bell Atlantic ISDN service is available - today - to nearly 20 million households in the mid-Atlantic region and the Northeast. ISDN can provide Internet connections that are more than four times faster than traditional 28.8 Kbps modems. Nearly half of the one million ISDN lines installed in the United States are used by Bell Atlantic customers.

Purchase of InfoSpeed DSL not required. Limit one per household. ISDN modem must have been purchased from Bell Atlantic's Residential ISDN Center in Norfolk, VA or from Bell Atlantic's authorized sales agent IDRC or Telamon. Return of the ISDN digital modem invalidates this offer. Terms and Conditions associated with this program are subject to change.

Availability | What Is Infospeed DSL? | Pricing | FAQ

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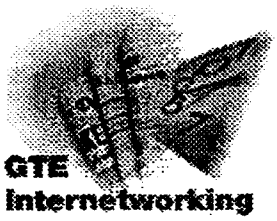

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GTE Internetworking Press Release

GTE to Offer Ultra-Fast Internet Access; Nation's Largest Deployment of Asymmetric Digital Subscriber Line (ADSL) Service to Roll Out in Two Phases Starting this June in Current Market Trial Locations; Fujitsu Network Communications Selected as Supplier of High-Speed Internet Access Equipment

Dallas –April, 13 1998– GTE today announced that it will begin offering consumers, businesses, universities and Internet service providers "always-on" high-speed Internet access and remote office connectivity service that helps boost connection speeds to the Internet at rates up to 50 times faster than conventional modems.

Beginning in June, upon regulatory approval, GTE Network Services, the incumbent local exchange carrier unit of GTE Corp., will offer network-based asymmetric digital subscriber line (ADSL) service in approximately 300 central offices in portions of 16 states, creating the nation's largest deployment of ADSL. To provide the service, GTE will install ADSL equipment supplied by Richardson, Texas-based Fujitsu Network Communications, Inc. and digital subscriber line partner Orckit Communications Ltd.

In the first of two phases, GTE will convert its current ADSL trials into broad-market deployment, enabling customers in portions of Beaverton, Ore., Durham, N.C., West Lafayette, Ind., and Redmond and Kirkland, Wash., to access the World Wide Web at speeds up to 1.5 megabits per second (Mbps). During the second half of the year, GTE plans to offer ADSL service in no less than 30 additional market clusters in California, Florida, Hawaii, Illinois, Indiana, Kentucky, Michigan, Missouri, North Carolina, Ohio, Oregon, Pennsylvania, Texas, Virginia, Washington and Wisconsin. (Editor's Note: See attached list of markets)

"Since launching the industry's first data-oriented ADSL trial, we have strived to develop a simple, friendly and affordable way to revolutionize the way our customers communicate," GTE President Kent B. Foster said. "This new service offering gives Internet users at work, home and school a competitive edge, and paves the way for increased productivity, and vastly improved performance compared to lower-speed modems."

The deployment of ADSL, said Foster, helps enable GTE to offer end-to-end Internet solutions on a broader scale, and is in keeping with the company's overall goal to become a national provider of integrated telecommunications services.

By the end of the year, GTE's central offices in parts of 16 states will be equipped to offer high-speed digital connections to the Internet over existing telephone lines. The availability and timing of ADSL service in

each state will be dependent upon local market conditions, and will not be offered ubiquitously.

The network efficiency of ADSL

ADSL works by connecting a pair of modems to each end of a telephone line, with one modem located in the telephone company's central office and the other at the customer's premises, providing a continuous Internet access rather than traditional dial-up modem connections.

With ADSL, consumers can simultaneously surf the World Wide Web and place telephone calls over the same line. Compared to cable modems, ADSL offers greater flexibility when choosing Internet service providers and network connectivity alternatives. ADSL also delivers dedicated bandwidth from the central office to individual users at their homes or offices unlike cable modems that provide shared bandwidth among a group of users over the same path. Further, GTE has a track record of network reliability which provides an additional advantage to customers interested in higher bandwidth services.

Fujitsu Network Communications selected as ADSL equipment provider

In the central offices where service will be offered, GTE will install Fujitsu's SPEEDPORTTM equipment, developed with its partner Orckit (NASDAQ: ORCTF). In addition, Fujitsu-supplied Orckit modems will be installed on customer premises, providing high-speed Internet and remote access.

"As the leading supplier of fiber-optic transport solutions to local exchange carriers in North America, Fujitsu is very excited about entering the high-speed access market with an innovative service provider like GTE," said George Chase, executive vice president of sales and marketing for Fujitsu Network Communications. "Our SPEEDPORT ADSL system will provide the flexible service solutions that GTE and its customers need to make the most of high-speed Internet access for residential and commercial applications."

An information highway lined with green lights

"Our trial participants have told us loud and clear that their increased need for information requires greater bandwidth and speed. With ADSL, their information highway will be lined with green lights, and they can confidently put their interactive pedal all the way down to the floorboard," said John Appel, president-GTE Network Services. "Our world is becoming more and more digital, and voice, video and data services are converging into a single ubiquitous network. ADSL becomes the 'last mile' or local loop enabler that helps deliver a new realm of multimedia content and enhanced Internet protocol services to customers."

Pending regulatory approval, GTE plans to offer several ADSL service packages featuring various transmission speeds ranging from 256 kilobits per second (kbps) to 1.5 megabits per second (Mbps). For comparison, a 2 1/2-minute movie clip of Superman (8.8 megabytes) would take 35 minutes to download using a 33.6 kbps modem, yet less than 47 seconds using a 1.5 Mbps ADSL modem. Likewise, an initial downloading of a 50 megabyte interactive game would painstakingly take three hours and 18 minutes with a 33.6 kbps modem, but just 4 1/2 minutes with a 1.5 Mbps connection.

GTE to offer five ADSL service packages

GTE will offer customers month-to-month, multi-year term and volume discount plans with a target monthly price range of $30 to $250, excluding one-time installation, Internet service charges and modem lease. A modem lease rate of about $12 per month is expected, plus a one-time installation fee of $60 or $140, dependent upon whether or not a modem and inside wire are installed at the customer's premises.

The five service packages, excluding Internet service and modem rental, are:

- Bronze -- up to 256 kpbs access for casual Internet or work-at-home users.
- Silver -- up to 384 kbps access for active telecommuters and small business customers with greater bandwidth needs.
- Gold -- up to 768 kbps access for highly active business customers and Internet users.
- Platinum -- up to 1.5 Mbps access for intensive business users and hard-core Internet customers.
- Platinum Plus / Multi-user -- up to 1.5 Mbps access for multiple business Internet users operating from the same local area network.

GTE also plans to offer customers high-speed ADSL with Internet access service, for approximately $60 a month through a relationship with GTE Internetworking, the Internet unit of GTE Corp. The company also intends to develop high-speed ADSL and Internet access service packages with other Internet service providers.

SPEEDPORT(TM) system uses industry-standard DMT technology

The SPEEDPORT system, with its core DSL technology provided by Fujitsu partner Orckit, consists of modems that will be installed at the customer's home or office, as well as high-powered equipment, known as DSL access multiplexers, to be placed at GTE central office sites. These DSL access multiplexers enable GTE to provide DSL service to a large number of customers at one time by concentrating the customers' data traffic over DS1 lines initially, providing for transparent upgrades to higher-speed backbone facilities as traffic demand warrants.

The SPEEDPORT system uses industry-standard DMT (Discrete Multi-tone) technology. It transmits data using the ethernet IP protocol, and is ATM (Asynchronous Transfer Mode) capable.

GTE's current ADSL market trials in Redmond and Kirkland, Wash., West Lafayette, Ind., Durham, N. C. and Beaverton, Ore. involve more than 1,300 users, including some 1,000-plus Microsoft employees, a small number of Intel employees in Oregon, plus students, faculty and scientists at Duke University Medical Center and Purdue University.

GTE, Fujitsu and Orckit are members of the Universal ADSL Working Group (UAWG), a consortium comprised of industry leading PC manufacturers, telecommunications providers and data networking companies, which earlier this year announced plans to develop a universal and interoperable ADSL standard to spur its deployment to the

mass market.

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About GTE

With 1997 revenues of more than $23 billion, GTE is one of the world's largest telecommunications companies and a leading provider of integrated telecommunications services. In the United States, GTE provides local service in 28 states and wireless service in 17 states; nationwide long-distance service and internetworking services ranging from dial-up Internet access for residential and small business consumers to Web-based applications for Fortune 500 companies; as well as video service in selected markets. Additional information about GTE can be found on the Internet at http://www.gte.com.

About Fujitsu

Fujitsu Network Communications, Inc., designs and manufactures fiber-optic transmission and broadband switching platforms and develops software that allows customers to perform in-service management and monitoring of the telephone network. Its customers include local exchange carriers, interexchange carriers, competitive access providers and cable TV operators, as well as large private networks in North America. Fujitsu Network Communications is part of Fujitsu Limited, a $36 billion global technology leader in computers, communications and microelectronics. Product information is available by calling 800-777-FAST. Its World Wide Web site is at http://www.fnc.fujitsu.com.

SPEEDPORT(TM) is a trademark of Fujitsu Network Communications, Inc.

About Orckit

Orckit Communications Ltd. is a leader in digital subscriber line solutions. Orckit has both core silicon expertise and a wide range of DSL systems and products, including DSLAM systems with ADSL and SDSL, and its HDSL and VDSL product lines. Orckit has alliances with several leading semiconductor companies and telecom equipment providers. For more information, visit Orckit's web site at http://www.orckit.com.

Markets Where GTE Plans To Offer Asymmetric Digital Subscriber Line (ADSL)

Service In 1998:

California: Availability begins in June Long Beach, Norwalk, Ontario, Palm Springs, Redondo, San Bernardino, San Fernando, Santa Barbara, Santa Monica, Thousand Oaks, Victorville

Florida: Availability begins in June Sarasota, St. Petersburg, Tampa

Hawaii: Availability begins in June Hilo, Oahu

Illinois: Availability begins in June Bloomington (Illinois State University), Carbondale (Southern Illinois University), Dekalb (Northern Illinois University)

Indiana: Availability begins in June Elkhart, Fort Wayne, Jasper, West Lafayette (Purdue Univ.), North Vernon, Terre Haute (Indiana St.

University), Valparaiso

Kentucky: Availability begins in June Lexington (University of Kentucky)

Michigan: Availability begins in July Mount Pleasant (Central Michigan University), Muskegon

Missouri: Availability begins in October Columbia (University of Missouri)

North Carolina: Availability begins in June Durham (Duke University)

Ohio: Availability begins in July Athens (Ohio University), Bowling Green (BG University), Norwalk

Oregon: Availability begins in June Beaverton

Pennsylvania: Availability begins in September Erie, Hershey, York

Texas: Availability begins in June Carrollton, College Station (Texas A&M University), Denton, Garland, Grapevine, Irving, Lewisville, Plano, San Angelo, Texarkana

Virginia: Availability begins in July Dahlgren, Dale City, Harrisonburg (James Madison University)

Washington: Availability begins in June Bothell, Everett, Kennewick, Kirkland, Pullman (Washington State University), Redmond, Sammamish

Wisconsin: Availability begins in September Wausau

For More Information Contact:

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PACIFIC BELL INTERNET DSL

DSL Internet Access Solutions

Pacific Bell Internet offers several complete solution packages designed to get you or your business on the Internet quickly and easily. Solution packages are available for individuals as well as for customers with a LAN. Both solution packages include the required networking hardware, hardware configuration, and on-site installation -- all at a significant cost savings

Home Pack DSL - *For single workstation customers*

HomePack DSL features include:

- DSL service installation from Pacific Bell (384/128, 384/384 or 1.5/384)
- DSL Basic Internet access from Pacific Bell Internet (1 year term required)
- DSL hardware package from Prime Services Group:
    - DSL modem
    - Splitter
    - Inside Wiring
    - On-site Installation

Total start-up cost for Home Pack DSL - **$299** *($249 without NIC)*

Internet Access Pack DSL - *For customers with a LAN*

Internet Access Pack DSL features include:

- DSL service installation from Pacific Bell (384/128, 384/384 or 1.5/384)
- DSL Enhanced or Business Internet access from Pacific Bell Internet (1 year term required)
- DSL hardware package from Prime Services Group:
    - DSL modem
    - Splitter
    - Inside Wiring
    - On-site Installation

Total start-up cost for Internet Access Pack DSL - **$449*** *($50 more with NIC)*

Total start-up cost for Internet Access Pack DSL with Router - **$1,224*** *($1,274 with NIC)*
(A router is required for local area networks with more than 15 workstations.)

*Pricing assumes Pacific Bell term contract for 384/384 and 1.5/384 speeds. Add $125 without term contract.

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PACIFIC BELL NETWORK

FasTrak℠ DSL

Pricing and Availability

FasTrak DSL Pricing

	Installation price	Monthly price
384/128 Kbps	$125	$59
384/384 Kbps	$125	$99
1.54Mbps/384Kbps	$125	$189

Notes: Price covers the circuit connection from the end user location to the Pacific Bell *FasTrak* DSL network and is in addition to charges for standard phone service.

Equipment and Equipment Installation Pricing

The required equipment for *FasTrak* DSL consists of an Ethernet Network Interface Card (NIC) and the following hardware: DSL modem, splitter, and inside wire. Prices include installation or phone support for one PC.

DSL hardware and Network Interface Card, with full installation	$660
DSL hardware, with full installation	$610

Notes:
Other Equipment Installation pricing options available upon request.

- Network Interface Card pricing for Macintosh computers available upon request.
- Customers may provide their own Ethernet Network Interface Card.
- Modem and splitter vendor: Alcatel.
- All rates, terms, and conditions are subject to change without notice.

Installation and Customer hardware support is provided by Prime Services Group, Inc. In addition to supporting the installation of the Alcatel 1000 ADSL modem, PSG also supports *FasTrak* DSL LAN solutions. With the Alcatel 1000 ADSL modem and a router, customers can establish a small LAN ideal for sharing the bandwidth of *FasTrak* DSL for high speed Internet access. Click here to obtain more information on the Alcatel modem.

Internet Service Provider Pricing

You must have an Internet access account with an Internet Service Provider that supports *FasTrak* DSL. You may select the Internet Service Provider of

your choice. Participating providers currently include:

- BAIS
- Concentric Network Corporation
- Direct Network Access, Inc.
- Flashcom
- InReach
- Orconet
- Pacific Bell Internet
- Sirius
- SlipNet

Corporate LAN Connection to The Pacific Bell *FasTrak* Network

Pacific Bell *FasTrak* ATM Cell Relay Service is required for corporate customers with the *FasTrak* DSL remote LAN access application. Please contact your Pacific Bell Account Representative for more information on ATM Cell Relay Service.

Availability

Click here to see if *FasTrak* DSL is available in your area. If you have questions, see the DSL FAQ.

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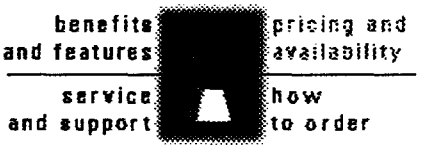

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CERTIFICATE OF SERVICE

I, Stuart M. Rennert, do hereby certify, that I have on this fifteenth day of October, 1998 served by first-class United States mail, postage paid, a true copy of the forgoeing SBC - Ameritech Comments, upon the following:

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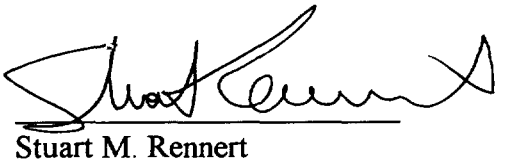

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* Denotes Hand Delivery